UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Civil No. 18-cv-1776 (JRT/HB)

This Document Relates To:

JOINT UPDATE LETTER

ALL ACTIONS

Dear Judge Bowbeer:

Pursuant to the proposed order submitted at ECF No. 615, plaintiffs and defendant Agri Stats Inc. ("Agri Stats") hereby provide the following joint update regarding the status of their ongoing negotiations regarding document search methodology and search terms. The parties have had a number of substantive discussions regarding the document search methodology and search terms that will be used by Agri Stats. The parties have made significant progress but a number of current disputes still remain. Plaintiffs and Agri Stats have not yet exhausted the meet-and-confer process; and plaintiffs and Agri Stats believe that they will be able to resolve or narrow the current disputes regarding the document search methodology and search terms if given more time to meet and confer.

Plaintiffs and Agri Stats will work diligently to complete the meet-and-confer process relating to the Agri Stats document search methodology and search terms by February 5, 2021. The parties shall submit a joint status letter by February 5, 2021 regarding any disputes on document search methodology and search terms that still remain at that point.

DATED: January 22, 2021

PEARSON SIMON & WARSHAW, LLP LOCKRIDGE GRINDAL NAUEN P.L.L.P.

/s/ Bobby Pouya

BOBBY POUYA (Pro Hac Vice)

/s/ Arielle S. Wagner

ARIELLE S. WAGNER (MN #0398332)

Clifford H. Pearson (*Pro Hac Vice*) Daniel L. Warshaw (*Pro Hac Vice*)

Michael H. Pearson (Pro Hac Vice)

15165 Ventura Boulevard, Suite 400

Sherman Oaks, CA 92403

W. Joseph Bruckner (MN #0147758)

Brian D. Clark (MN #0390069)

Craig S. Davis (MN #0148192)

Simeon A. Morbey (MN #0391338)

Telephone: (818) 788-8300 Facsimile: (818) 788-8104 cpearson@pswlaw.com dwarshaw@pswlaw.com bpouya@pswlaw.com mpearson@pswlaw.com

Melissa S. Weiner (MN #0387900) Joseph C. Bourne (MN #0389922) PEARSON, SIMON & WARSHAW, LLP 800 LaSalle Avenue, Suite 2150 Minneapolis, MN 55402 Telephone: (612) 389-0600 Facsimile: (612) 389-0610 mweiner@pswlaw.com ibourne@pswlaw.com

Bruce L. Simon (Pro Hac Vice) PEARSON, SIMON & WARSHAW, LLP 350 Sansome Street, Suite 680 San Francisco, CA 94104 Telephone: (415) 433-9000 Facsimile: (415) 433-9008 bsimon@pswlaw.com

Stephen M. Owen (MN # 0399370) Stephanie A. Chen (MN #0400032) 100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401 Telephone: (612) 339-6900 Facsimile: (612) 339-0981 aswagner@locklaw.com wjbruckner@locklaw.com csdavis@locklaw.com bdclark@locklaw.com samorbey@locklaw.com smowen@locklaw.com sachen@locklaw.com

Co-Lead Class Counsel for Direct Purchaser Plaintiffs

HAGENS BERMAN SOBOL SHAPIRO CUNEO GILBERT & LADUCA, LLP LLP

/s/ Shana E. Scarlett

SHANA E. SCARLETT

715 Hearst Avenue, Suite 202

Berkeley, CA 94710

Telephone: (510) 725-3000 Facsimile: (510) 725-3001 shanas@hbsslaw.com

Steve. W. Berman Breanna Van Engelen HAGENS BERMAN SOBOL SHAPIRO LLP

/s/ Blaine Finley **BLAINE FINLEY**

Jonathan W. Cuneo Joel Davidow Yifei "Evelyn" Li 4725 Wisconsin Avenue NW, Suite 200 Washington, DC 20016 Telephone: (202) 789-3960 jonc@cuneolaw.com

joel@cuneolaw.com bfinley@cuneolaw.com evelyn@cunelolaw.com 1301 2nd Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292 Facsimile: (206) 623-0594

steve@hbsslaw.com breannav@hbsslaw.com

GUSTAFSON GLUEK PLLC

/s/ Brittany N. Resch
BRITTANY N. RESCH (#0397656)

Daniel E. Gustafson (#202241)
Daniel C. Hedlund (#258337)
Michelle J. Looby (#388166)
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
bresch@gustafsongluek.com

Co-Lead Counsel for Consumer Indirect Purchaser Plaintiffs

HOGAN LOVELLS US LLP

/s/ Justin W. Bernick
JUSTIN W. BERNICK (Pro Hac Vice)

Peter H. Walsh (#0388672) 80 South Eighth Street, Suite 1225 Minneapolis, MN 55402 T. (612) 402-3000 F. (612) 402-3001 peter.walsh@hoganlovells.com

William L. Monts (pro hac vice) HOGAN LOVELLS US LLP Shawn M. Raiter (MN# 240424) LARSON • KING, LLP 2800 Wells Fargo Place 30 East Seventh Street St. Paul, MN 55101 Telephone: (651) 312-6518 sraiter@larsonking.com

Co-Lead Counsel for Commercial and Institutional Indirect Purchaser Plaintiffs Columbia Square 555 Thirteenth Street, NW Washington, D.C. 20004 (202) 637-5600 william.monts@hoganlovells.com justin.bernick@hoganlovells.com

Counsel for Agri Stats, Inc.